

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF FLORIDA
MIAMI DIVISION**

CIVIL DIVISION

Case No.: _____

SHARON GALLIMORE,

Plaintiff,

vs.

**CITY OF OPA-LOCKA, FLORIDA,
a municipal corporation authorized to
do business under the laws of the State
of Florida,**

Defendant.

/

**VERIFIED COMPLAINT
AND
DEMAND FOR JURY TRIAL**

Plaintiff **SHARON GALLIMORE** ("GALLIMORE" or "Plaintiff") files this Verified Complaint and sues the **CITY OF OPA-LOCKA, FLORIDA** ("CITY") for damages, demands a trial by jury, and hereby states as follows:

1. This is an action seeking damages in excess of One Million Dollars (\$1,000,000) and other relief by a 25-year employee of the **CITY OF OPA-LOCKA** who was subjected to an adverse personnel action and outrageous harassment by the **CITY** because of her gender, her age and because she filed complaints and complained about prohibited practices under Title VII.

2. Plaintiff is *sui juris*, a resident of Miami Dade County and a former employee of the CITY;
3. The CITY is a municipal government entity and as such, is an "agency" as envisioned by Title VII;
4. Venue is proper in the Southern District of Florida because Defendant CITY is located within Miami-Dade County, Florida, and all of the acts occurred within said County;
5. All conditions precedent to this cause of action, including exhaustion of administrative remedies and notice under application statutory schemes have been met, waived, excused, or would be futile;
6. Plaintiff filed an EEOC Complaint, received a Right to Sue Letter and filed this Verified Complaint in a timely fashion.
7. Plaintiff has retained the services of the undersigned attorneys and is obligated to pay reasonable attorneys' fees and costs associated with this action.

GENERAL ALLEGATIONS

8. Plaintiff was employed by Defendant CITY OF OPA-LOCKA for over twenty-five (25) years;
9. Sharon Gallimore was specifically a City of Opa-Locka Police Officer since 1996 and was the highest ranking female in the Opa-Locka Police Department;
10. The Plaintiff has been discriminated against her age and gender and retaliation;
11. For over 20 years the Plaintiff had excellent performance, was a Chief Deputy and ranked number two in the Opa-Locka Police Department;
12. Without any legitimate non-discriminatory basis, the City demoted the Plaintiff several levels back to patrol, while promoting lesser qualified younger and male officers;
13. There was no explanation for this other than age, gender and retaliation.
14. The City reduced the Plaintiff's salary after 20 years of excellent work;

15. The City also promoted **Plaintiffs** former position to male employees who do not have the same qualifications as the **Plaintiff**;
16. The City also promoted and provided better treatment to younger employees;
17. The City disrespected the **Plaintiff**, and have made discriminatory comments about the **Plaintiff** and taken adverse action in the form of demotions, humiliation and pay cuts because of **Plaintiffs** age and gender which is a Violation of Title VII and the ADEA;
18. This included promoting younger males who were less qualified to Chief over her, as well as ultimately demoting and then firing her.
19. The **Plaintiff** filed an EEOC Complaint and was retaliated against by changing the Plaintiffs duty station, denying leave, and then terminating **Plaintiff's** in direct of retaliation for gender and age based on **Plaintiffs** EEOC complaint.
20. The Plaintiff was at all times an outstanding employee.
21. The Plaintiff was never promoted from Deputy Chief to Chief, while the City hired multiple lesser experienced and lesser qualified males for the Chief position.
22. Plaintiff was terminated when she committed no misconduct and for pretextual reasons, while younger employees and specifically younger male employees who committed misconduct were not disciplined and in fact received more favorable treatment and promotions.
23. After the Plaintiff filed EEOC complaints and complained about prohibited practices under Title VII and the ADEA, specifically, ongoing discrimination against females and older employees, the City terminated her based on gender, age (over 40) and in retaliation for her complaints.

COUNT I
RETALIATION

1. **Plaintiff** re-alleges paragraphs 1 through 23 as if fully set forth therein.

2. Title VII prohibits retaliation against an employee because they opposed prohibited practices and/or participate in investigations of prohibited practices.
3. **Plaintiff** was subjected to retaliation for opposing unlawful discrimination in violation of Title VII of the Civil Rights Act of 1964, as amended.
4. As a result, **Plaintiff** was damaged.

WHEREFORE, Plaintiff demands damages, including compensatory damages and all available relief.

COUNT II
VIOLATION OF AGE DISCRIMINATION EMPLOYMENT ACT
OF 1967 (ADEA)

24. **Plaintiff** re-alleges the allegations set forth in paragraphs 1 through 23 above as though fully set forth herein;
25. **Plaintiff** is a 51 year-old female, and the Defendant willfully discriminated against the **Plaintiff** due to her age.
26. **Plaintiff** is an employee as that term is defined under the Age Discrimination Employment Act of 1967 and the Defendant **City of Opa-Locka**, Florida is her employer as that term is defined under the Act;
27. The **City of Opa-Locka**, Florida provided more favorable treatment to younger employees based on age;
28. As a result of the **City of Opa-Locka**, Florida's illegal actions, Plaintiff has been damaged;

WHEREFORE, Plaintiff requests that the court enter a judgment in her favor finding that the City of Opa-Locka violated the ADEA, and award her any and all damages, including

compensatory, liquidated, and statutory damages, and any and all declaratory and injunctive relief as allowed by law. Plaintiff further requests an award of attorneys' fees and costs against the Defendant City of Opa-Locka and any and all other relief that the Court deems just and proper.

COUNT III
DISCRIMINATION BASED ON SEX/GENDER
IN VIOLATION OF TITLE VII

1. Plaintiff re-alleges paragraphs 1 through 23 as if fully set forth herein.
2. Plaintiff is an African American Female.
3. She was terminated and discriminated against because of her gender.
4. As a direct and proximate result, Plaintiff has suffered permanent damages.

WHEREFORE, Plaintiff demands judgment for damages against the City, including but not limited to compensatory damages, back pay and benefits, future pay, and benefits,

DEMAND FOR JURY TRIAL

Plaintiff respectfully demands trial by jury for all issues so triable as a matter of law.

VERIFICATION

I, SHARON GALLIMORE, on this 8th day of August 2022, declare under penalty of perjury that the facts and the allegations contained in the above Complaint are true and accurate to the best of my ability, knowledge, and belief.





SHARON GALLIMORE

Respectfully submitted,

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